

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

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**In Re: John P. Waggoner and Rebecca B. Waggoner**

Bankruptcy No. 15-14310

Chapter 7

Debtor(s).

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***AMENDED MOTION TO APPROVE SALE***

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Now comes, Parrish J. Jones as Trustee and Attorney for the Trustee, who moves the court as follows:

1. This is a Chapter 7 bankruptcy, filed on December 1, 2015.
2. The debtors have a  $\frac{1}{4}$  interest in the following described "Property":

Lot One (1) and Lot Two (2) of Certified Survey Map No. 7873 in Volume 32, Pages 194-195 as Document No. 383089, a part of the Northwest Quarter of the Northeast Quarter (NW  $\frac{1}{4}$ -NE  $\frac{1}{4}$ ) and Part of the Southwest Quarter of the Northeast Quarter (SW  $\frac{1}{4}$ -NE  $\frac{1}{4}$ ), of Section Thirty (30), Township Forty-one (41) North, Range Seven (7) West (in the Town of Round Lake), Sawyer County, WI.

Also granted herein is a 20 foot wide perpetual, non-exclusive private easement that extends from Lot 1 of Certified Survey Map No. 1262 in Volume 6, Page 271 as Document No. 170002, and Certified Survey Map No. 7873 in Volume 32, Pages 194-195 as Document No. 383089, a part of the Northwest Quarter of the Northeast Quarter (NW  $\frac{1}{4}$ -NE  $\frac{1}{4}$ ) and Part of the Southwest Quarter of the Northeast Quarter (SW  $\frac{1}{4}$ -NE  $\frac{1}{4}$ ), of Section Thirty (30), Township Forty-one (41) North, Range Seven (7) West (in the Town of Round Lake), Sawyer County, WI to the Town Road.

Parcel ID Nos. 57-024-2-41-07-30-1 30-000-000130  
57-024-2-41-07-30-1 03-000-000120

3. After being on the market for a number of years, the Trustee has received and offer (the "Offer") to purchase the bankruptcy estate's  $\frac{1}{4}$  interest in the real estate with net estimated proceeds being \$13,080.48.
4. The general terms of the Offer is as stated in the attached Exhibit A.
5. The Trustee believes that the Offer and total of \$70,000.00 (net \$13,080.48) is fair, reasonable, appropriate and in the best interest of the cost effective and efficient administration of the bankruptcy estate.

6. Accordingly, the Trustee requests that the Court approve the sale in the amount and under terms and conditions as set forth in the Offer and that the Trustee be authorized to execute any and all documents necessary to effectuate the terms of the Offer and to transfer the Real Estate to the Buyers.

WHEREFORE, the Trustee respectfully requests the Court to Enter an Order as follows:

- A. Finding that due and appropriate notice of this Motion has been made and that no further notice need be given under these circumstances;
- B. Approving the terms of the Offers;
- C. Authorizing the Trustee to execute all documents necessary to effectuate the transfer of the Real Estate to the Buyers;
- D. For such other and further relief as the Court in its discretion deems equitable and just under these circumstances.

Dated this 1<sup>st</sup> day of July 2019.

*/s/ Parrish J. Jones*

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Parrish J. Jones  
State Bar Nos. WI 1056811, MN 0386384  
823 Belknap Street, Suite 222  
Superior, WI 54880  
Telephone: 715-394-7751  
Facsimile: 715-394-3414  
Email: [pjones@superiorlawoffices.com](mailto:pjones@superiorlawoffices.com)

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Bankruptcy No. 15-14310

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**NOTICE OF MOTION TO APPROVE SALE**

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PLEASE TAKE NOTICE, that Parrish J. Jones, of Torvinen, Jones, Routh, Torvinen & Saunders, S.C., trustee and as attorney for the trustee, has filed papers with the court to approve a sale in this case, a copy of which is enclosed.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to approve the turnover requested, or if you want the Court to consider your views on the Motion, then on or before **July 22, 2019**, you or your attorney must:

File with the court a written request for a hearing at:

Clerk of Court  
United States Bankruptcy Court  
500 South Barstow Street  
Eau Claire, WI 5470

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Parrish J. Jones  
Torvinen, Jones, Routh & Torvinen, S.C.  
823 Belknap Street, Suite 222  
Superior, WI 54880

and to:

U.S. Trustee's Office  
780 Regent Street, Suite 304  
Madison, WI 53715

If you or your attorney do not take these steps, the Court may decide that you do not oppose the sale sought in the motion and may enter an order granting the sale.

Dated this 1<sup>st</sup> day of July 2019.

*/s/ Parrish J. Jones*

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Parrish J. Jones  
State Bar Nos. WI 1056811, MN 0386384  
823 Belknap Street, Suite 222  
Superior, WI 54880  
Telephone: 715-394-7751  
Facsimile: 715-394-3414  
Email: [pjones@superiorlawoffices.com](mailto:pjones@superiorlawoffices.com)

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**PROOF OF SERVICE**

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Kjersten Soeffker-Chase, states that on July 1 2019, she mailed properly enclosed in a postpaid envelope a true and correct copy of a Motion to Approve Sale and proposed Order Approving the Sale, the originals of which have been electronically filed herein, to each of the following parties at their respective addresses unless received electronically through the filing of this document:

***Via Electronic Filing:***

Matthew L. Comella on behalf of Creditor Wells Fargo Bank, N.A.  
[mcomella@kmksc.com](mailto:mcomella@kmksc.com), [aharris@kmksc.com](mailto:aharris@kmksc.com)

Kevin T. Duffy on behalf of Debtors John P. Waggoner and Rebecca B. Waggoner  
[duffylaw@mncable.net](mailto:duffylaw@mncable.net)

Mitchell A. Routh on behalf of Trustee Parrish J. Jones  
[mrouth@superiorlawoffices.com](mailto:mrouth@superiorlawoffices.com), [reception@superiorlawoffices.com](mailto:reception@superiorlawoffices.com)

U.S. Trustee's Office  
[USTPRegion11.MD.ECF@usdoj.gov](mailto:USTPRegion11.MD.ECF@usdoj.gov)

***Via U.S. Mail***

See attached mailing matrix.

Dated this 1<sup>st</sup> day of July 2019.

/s/ Kjersten Soeffker-Chase

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Kjersten Soeffker-Chase

Alliance Collection Agency  
P.O. Box 1267  
Marshfield, WI 54449-7267

American Education Services  
P.O. Box 2461  
Harrisburg, PA 17105-2461

Anderson, Hager and Moe  
P.O. Box 231  
Hayward, WI 54843

Annemarie Dorothy Case  
Case Law Firm  
400 N. Broadway, Suite 402  
Milwaukee, WI 53202

Ardisam/Eskimo  
P.O. Box 666  
Cumberland, WI 54829

Bank of America  
7322 Southwest Freeway  
Suite 1600  
Houston, TX 77074-2053

Bank Of America  
P.O. Box 982235  
El Paso, TX 79998-2235

Bank Of America  
P.O. Box 851001  
Dallas, TX 75285-1001

Bank of the West  
118 Elm St.  
Spooner, WI 54801

Berry Co.  
P.O. Box 790334  
Saint Louis, MO 63179

Bimbo Skunk  
612 Clayton St.  
Cameron, WI 54822

Biologic, LLC  
P.O. Box 1967  
Decatur, AL 35602

Chase Bank  
Cardmember Services  
P.O. Box 94014  
Palatine, IL 60094

Client Services, Inc.  
3451 Harry S. Truman Blvd.  
Saint Charles, MO 63301-4047

Como Oil and Propane  
809 W. Limits Road  
Minong, WI 54859

Cortland Line MFG.  
P.O. Box 5588  
Cortland, NY 13045

Covert Scouting  
4338 Greenridge-Spare  
Lewisburg, KY 42256

First Merit Bank  
111 Cascade Plaza, CAS36  
Akron, OH 44308-1103

Fox River Glove and Garment Co.  
113 West Fond Du Lac St.  
Ripon, WI 54971

Holdup Suspenders  
21421 Hilltop Dr., Suite 16  
Southfield, MI 48034

Marshfield Clinic  
2655 Co. Hwy. 1  
Chippewa Falls, WI 54729

Marshfield Clinic  
1000 N Oak Ave  
Marshfield, WI 54449

Mission  
P.O. Box 247  
Sparta, WI 54656

Mountain State Commercial Collection  
333 West Hampton Ave., #820  
Englewood, CO 80110

MSCCM  
333 W Hampden Ave #820  
Englewood, CO 80110

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Republic Services #930  
P.O. Box 9001099  
Louisville, KY 40290-1099

Rivers Edge  
P.O. Box 755  
Cumberland, WI 54829

Sheffield Financial  
P.O. Box 580229  
Charlotte, NC 28258-0229

Sheffield Financial  
P.O. Box 1847  
Wilson, NC 27894-1847

Shimano American Corp.  
P.O. Box 512408  
Los Angeles, CA 90051

Shimano American Corporation  
Case Law Firm, S.C.  
400 N. Broadway  
Suite 402  
Milwaukee, WI 53202

Sports Specialist  
P.O. Box 10  
Germantown, WI 53022

Sports Specialists of Milwaukee Inc.  
c/o Steven Stolper  
740 N. Plankinton Ave., #336  
Milwaukee WI 53203

Steven L. Stolper, Attorney at Law  
740 N. Plankinton Ave.Ste.336  
Milwaukee, WI 53203-2403

United Recovery Systems  
P.O. Box 722929  
Houston, TX 77272-2929

US Bank  
P.O. Box 790408  
Saint Louis, MO 63179-0408

Wells Fargo  
P.O. Box 14411  
Des Moines, IA 50306-3411

U.S. Bank National Association  
PO Box 5229  
Cincinnati, OH 45201